

2023 - Fighting Against Forced Labour and Child Labour in Supply Chains Act Report – Viatris Canada

Introduction

This is Viatris Canada's¹ report for the 2023 year, pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, [SC 2023](#), c 9 (the "Act").²

Viatris Canada is committed to conducting business in accordance with the highest degree of integrity and in compliance with applicable laws, which includes recognizing and respecting human rights across all its operations. To that end, Viatris Canada prohibits all forms of slavery and human trafficking within its own operations and in its external supply chain and is committed to the Ten Principles of the UN Global Compact and respects the International Bill of Human Rights and the Fundamental Conventions of the International Labour Organization.

Steps to prevent and reduce risks of forced labour and child labour

As further detailed below, Viatris Canada follows the global policies, procedures, and the due diligence practices of Viatris Inc. ("Viатris")³ that demonstrate Viатris' strong commitment to respecting human rights. Therefore, this report will refer to many of Viатris' global policies, procedures, and practices.

Viatris and Viatris Canada take multiple steps to identify, prevent and reduce risks of forced labour and child labour in their operations and those of their suppliers. Viatris has robust internal and external policies that address slavery, human trafficking, child labour, forced labour and ethical standards.⁴ This commitment is also reflected in the [Code of Business Conduct and Ethics \(the "Code of Conduct"\)](#), which outlines the ethical standards Viatris follows to conduct business, and in Viатris' [Supplier Code of Conduct](#) (the "Supplier Code").

(a) Structure, Activities and Supply Chains

Mylan Pharmaceuticals ULC, BGP Pharma ULC, and Upjohn Canada ULC all operate under the business name Viatris Canada as subsidiaries of Viatris. Viatris Canada commercializes and sells branded and generic pharmaceutical products in the Canadian market that cover a wide variety of therapeutic areas. Its offices are located in Etobicoke, Ontario.

¹ Viatris Canada is comprised of the companies Mylan Pharmaceuticals ULC, BGP Pharma ULC and Upjohn Canada ULC. Mylan, BGP and Upjohn are registered corporations in Alberta, Nova Scotia and British Columbia, respectively.

² The information contained in this report is not for use in product detailing or promotion.

³ Mylan Pharmaceuticals ULC, BGP Pharma ULC and Upjohn Canada ULC are subsidiaries of Viatris Inc.

⁴ Viатris' Policy Statement Regarding Slavery and Human Trafficking and its Global Policy on Combating Trafficking in Persons; Code of Business Conduct and Ethics; Viатris' Supplier Code of Conduct.



Viatris Canada's approximately 160 employees work primarily in sales and marketing, or in various support functions. The head of Viatris Canada is the Country Manager, who in turn reports to Viatris' Head of North America.

Viatris is a global healthcare company headquartered in the United States with global centers in Pittsburgh, Pennsylvania; Shanghai, China, and; Hyderabad, India. Viatris is committed to building sustainable access to medicine, and believes every person matters and deserves the opportunity to live a healthy life.

Viatris' approximately 40 manufacturing sites across five continents, combined with its global supply chain network and the facilities of the many partners with whom Viatris collaborates on manufacturing, development, supply and logistics, offer a worldwide, strategically located network of robust size and scope.⁵

The active pharmaceutical ingredients ("APIs") and other materials and supplies Viatris uses in its manufacturing operations are sourced and purchased from third parties or produced internally.⁶ Approximately 45% of Viatris' APIs come from India and China, and the remainder originate from North America, Europe and Emerging Markets.⁷

Membership in Groups

Viatris is a full active member of the Pharmaceutical Supply Chain Initiative (PSCI), an organization of pharmaceutical companies whose purpose is to define, establish, and promote responsible supply chain practices, human rights, environmental sustainability, and responsible business. PSCI's Principles state, among other things, that suppliers shall uphold the human rights of workers by not using forced, bonded labour, indentured or child labour. The PSCI Principles are available online at: <https://pscinitiative.org/resources>.⁸

Viatris is also a signatory to the United Nations Global Compact and is committed to the Compact's Ten Principles related to human rights, labour, environment, and anti-corruption.⁹

(b) Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

For the remainder of this report, Viatris Canada and Viatris Inc. shall be referred to collectively as Viatris.

Viatris has several global policies, procedures, and due diligence practices that demonstrate its strong commitment to respecting human rights and decent working conditions.

⁵ Following the anticipated closing of its API divestiture in 2024, Viatris will operate approximately 30 manufacturing sites worldwide.

⁶ [2023 Sustainability Report](#), pg 12.

⁷ [2023 Sustainability Report](#), pg 57.

⁸ [Viatris' Policy Statement Regarding Slavery and Human Trafficking](#), pg 1.

⁹ [Global Policy on Combating Trafficking in Persons](#), pg 1.



Viатris prohibits all forms of slavery and human trafficking within its own operations and in its supply chain as described in [Viатris' Policy Statement Regarding Slavery and Human Trafficking](#) and its [Global Policy on Combating Trafficking in Persons](#). This commitment is also reflected in the [Code of Conduct](#), which outlines the ethical standards Viатris follows to conduct business throughout the world, and in Viатris' [Supplier Code](#). The Supplier Code prohibits suppliers from using forced, bonded, indentured or illegal child labour; requires suppliers to respect workers' freedom of association, and; requires adherence to all applicable laws regarding wages, benefits, hours of work and working conditions.¹⁰ The Supplier Code also prohibits suppliers from supporting, promoting or engaging in slavery or human trafficking. Viатris' above-mentioned policies are publicly available on Viатris.com.¹¹

Topics relevant to human rights are addressed through a variety of company policies and procedures, in addition to those listed above. For a description of the human rights related topics that are covered by the Company's various policies, procedures, and programs, we refer you to Viатris' [2023 Sustainability Report](#) (the "Sustainability Report").

Viатris employees

Viатris' Code of Conduct, to which Viатris employees are subject, outlines guiding principles on how employees and those working on Viатris' behalf must conduct themselves. Every Viатris employee must periodically certify that they have read the Code of Conduct and that they, to the best of their knowledge and belief, understand, have complied with and will continue to comply with the Code of Conduct, applicable law and company policy. Compliance with the Code of Conduct, and applicable law, by all Viатris employees is mandatory and is a condition of retention, employment or continued engagement as a contractor or agent.¹²

Further, the Global Policy on Combatting Trafficking in Persons outlines the individual responsibilities of Viатris colleagues in preventing the use of forced or child labour. These individual responsibilities include, for example, a commitment not to use forced labour or child labour or use suppliers, recruiters, or any other third-party agents that do not comply with local labour laws of the country in which their services take place, and a commitment to report any actual or suspected violations of the Global Policy on Combatting Trafficking in Persons that a colleague reasonably believes has occurred or may occur in the future, in accordance with the Raising Concerns policy requirements outlined in Viатris' internal Global Compliance Governance Document.¹³

¹⁰ [Viатris' Policy Statement Regarding Slavery and Human Trafficking](#), pg 1.

¹¹ www.viatris.com

¹² [Code of Conduct](#), pg 5

¹³ [Global Policy on Combating Trafficking in Persons](#), pg 3.



Third parties

As described in greater detail in the Sustainability Report, ViatriS' Supplier Code is the guiding document for suppliers wanting to do business with any of ViatriS' affiliates and sets a minimum standard of conduct. The Supplier Code is based on ViatriS' commitment to the UN Global Compact and the PSCI Principles.¹⁴ The Supplier Code lays out the expectations in several specific areas concerning labour and human rights, including freely chosen employment, fair treatment, and non-discrimination.

ViatriS expects that its suppliers abide by the Supplier Code which provides guidance and requirements for doing business with ViatriS. The Supplier Code prohibits suppliers from using forced, bonded, indentured, or illegal child labour; requires suppliers to respect workers' freedom of association; and requires adherence to all applicable laws regarding wages, benefits, hours of work and working conditions. The Supplier Code also prohibits suppliers from supporting, promoting, or engaging in slavery or human trafficking.¹⁵

Source selection is a key sourcing process for direct materials to ensure vendors meet ViatriS' minimum standards for quality, cost and compliance. Key vendors of strategic brands are also assessed against PSCI Principles, which define, establish and promote responsible supply chain practices, human rights, environmental sustainability and responsible business.¹⁶

The Compliance department identifies business partner categories that may carry higher risk. Such partners, noted during the business contract drafting and approval process, are subject to a risk review based on a robust due diligence process including investigation and clarification of discovered legal, civil and reputational allegations or convictions. ViatriS has a third-party due diligence program that is global in scope, managed by a dedicated team.¹⁷ ViatriS also has an EHS Supplier Operations Program which addresses the risk of slavery and human trafficking, as part of wider efforts to promote sustainable practices in the supply chain.¹⁸

Suppliers are also required to comply with the terms and conditions of applicable contracts and purchase orders entered between the parties. Each supplier doing business with ViatriS under these terms and conditions agrees it will comply with all applicable laws and regulations in its performance of the contract. ViatriS provides its Supplier Code to suppliers for their acknowledgement as part of the new source selection process for direct materials or renewal of existing supply agreements for direct raw materials and finished dose products. ViatriS

¹⁴ [2023 Sustainability Report](#), pg 59.

¹⁵ [Supplier Code of Conduct](#), pg 3.

¹⁶ [2023 Sustainability Report](#), pg 60.

¹⁷ [2023 Sustainability Report](#), pg 74.

¹⁸ [2023 Sustainability Report](#), pg 59.



reserves the right to assess suppliers' compliance with the Supplier Code through use of Viatris personnel or third parties.¹⁹

Further, Viatris' Council for Sustainable Sourcing and Engagement meets regularly throughout the year and is responsible for: Providing guidance and direction for sustainable sourcing; Developing the governance, practice and reporting of sustainable sourcing; Instilling the culture of sustainable sourcing within sourcing teams; Setting and tracking annual sustainable sourcing goals and objectives; Developing, implementing and aligning practices with enterprise policies and metrics from a sustainable sourcing perspective; Continuing to expand Viatris' focus on procurement to reduce environmental impacts.²⁰

Viatris also recognizes and respects the rights of employees to have freedom of association and collective bargaining as articulated in the International Labour Organization's core conventions.²¹

(c) Parts of the business and supply chain, if any, that carry a risk of forced labour and child labour and the steps taken to assess and manage that risk

Like other global industries, the manufacturing of pharmaceuticals carries the risk of forced labour and child labour in the supply chain. Potential areas of risk are evaluated by the programs identified throughout this report. Viatris' risk management includes policies, procedures, and due diligence efforts to deal with the risk of issues concerning human rights and/or decent working conditions. Viatris' risk assessment analysis encompasses, but is not limited to, the following risks and potential adverse impacts: wages, working hours, and safety in the workplace.²²

As part of de-risking the supply chain, Viatris also has a process for dedicated sustainability risk assessment and a third-party due diligence program, as discussed in section (b) of this report.²³

(d) Measures taken to remediate forced labour and child labour

As described in greater detail in the Sustainability Report, Viatris has global policies and practices allowing for all of its employees, or third parties who work with Viatris, to raise compliance concerns including those concerning human rights and decent working conditions.

Viatris encourages open communication and provides a variety of channels for reporting potential compliance violations of its policies. All Viatris employees are encouraged to discuss compliance concerns with their supervisor, Human Relations, Legal or Compliance.

¹⁹ [Viatris' Policy Statement Regarding Slavery and Human Trafficking](#), pg 2.

²⁰ [2023 Sustainability Report](#), pg 58.

²¹ [2023 Sustainability Report](#), pg 62.

²² [2023 Sustainability Report](#), pg 59.

²³ [2023 Sustainability Report](#), pgs 59 and 74.



Employees can also use the company's Compliance Line, which is operated by an external party. The Compliance Line is available 24/7 and permits anonymous reports in countries in local languages, where permitted by law. The Compliance Line is available both on ViatriS' intranet and [external website](#).

ViatriS also has a process for dedicated sustainability risk assessment and a third-party due diligence program, as discussed in section (b) of this report, including the right to assess suppliers' compliance with the Supplier Code through use of ViatriS personnel or third parties.²⁴

(e) Measures taken to remediate the loss of income to the most vulnerable families that results from the measures taken to eliminate the use of forced labour and child labour

ViatriS is not aware of lost income to vulnerable families resulting from ViatriS' policies against forced and child labour and, as such, has not taken any measures in this area.

(f) Training provided to employees on forced labour and child labour

In addition to comprehensive training in relevant areas in which an employee may work, ViatriS employees are required to complete regular trainings regarding the Code of Conduct, among other topics.²⁵

ViatriS has a compliance training module covering the Code of Conduct, which is available in a variety of languages.²⁶ ViatriS' Code of Conduct training module includes a supplementary Compliance Certification for Management intended to provide an additional mechanism to help reinforce key compliance program elements. All ViatriS colleagues are required to complete the Code of Conduct training.

In addition, most ViatriS employees, including all employees involved in managing procurement and supply chain activities have mandatory training on ViatriS' Supplier Code, including training on the topic of labour and human rights. ViatriS' internal communication and certain market-specific training instructs employees on how to identify risks concerning slavery and human trafficking, and how to report any suspected illegal activity.

To align suppliers with the Supplier Code, ViatriS has initiated dedicated supplier communications to its top suppliers by spend. ViatriS also leverages PSCI's supplier training programs to encourage suppliers to participate in webinars and to utilize training materials on topics promoting and increasing awareness of sustainable and responsible practices specific to pharmaceutical operations.²⁷

²⁴ [2023 Sustainability Report](#), pgs 59 and 74.

²⁵ [2023 Sustainability Report](#), pg 73.

²⁶ [2023 Sustainability Report](#), pg 73.

²⁷ [2023 Sustainability Report](#), pg 59.



(g) Assessing effectiveness in ensuring that forced labour and child labour is not being used in our business and supply chains

Viатris undertakes various efforts to continually work to verify that it does not promote or engage in slavery and human trafficking. Viатris requires employees to certify that they have read, understand, and agree to comply with Viатris' Code of Conduct, and tracks direct and indirect suppliers who receive the Supplier Code. Moreover, Viатris' standard supply agreement template includes sustainability language, references to the Supplier Code, and clear language on the right to follow up with suppliers as needed to verify their adherence to Supplier Code obligations. Viатris also conducts due diligence that involves an assessment of any issues (environmental, legal, social, or otherwise) regarding certain suppliers or other third parties.²⁸

After selection, those suppliers and third parties execute an agreement that specifically details Viатris' expectations and the right to conduct regular on-site audits to ensure ongoing compliance with regulations, maintain applicable regulatory reporting requirements and allow access to all records related to the supplied products, among other requirements.

Viатris continues to scale up its program for supplier sustainability and risk assessment. As part of this program, suppliers are subject to risk assessments and audits with relevance to slavery and human trafficking. Viатris may use third parties to assist with such audits.²⁹

Finally, as discussed in this report, the Code of Conduct, Supplier Code, and other policies subject employees and contractors who violate law or policy to discipline, including termination of employment or contract. Employees and external stakeholders are encouraged to report concerns about potential violations of company policy and are provided numerous tools for doing so as described in the Code of Conduct and the Supplier Code.³⁰

²⁸ [Global Policy on Combating Trafficking in Persons](#), pg 1.

²⁹ [Global Policy on Combating Trafficking in Persons](#), pg 1.

³⁰ [Viатris' Policy Statement Regarding Slavery and Human Trafficking](#), pg 2.



Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for BGP Pharma ULC, Mylan Pharmaceuticals ULC, and Upjohn Canada ULC, all operating as Viatris Canada. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Jeffrey Long

I have the authority to bind Mylan Pharmaceuticals ULC, BGP Pharma ULC, and Upjohn Canada ULC, collectively Viatris Canada

Jeffrey Long
Country Manager, Viatris Canada
May 30, 2024

Legal

Viatris Canada does not file reports under supply chain legislation in other jurisdictions. Viatris Canada's affiliates in various other jurisdictions do file such reports, including under the United Kingdom Modern Slavery Act of 2015, the Australia Modern Slavery Act of 2018, the California Transparency in Supply Chains Act of 2010 and the Norwegian Transparency Act of 2022.

We note that all forward looking statements in this report – including those that refer to other Viatris documents – reflect current expectations of future events and are subject to factors which may differ from those described in the forward-looking statements. These statements are subject to the disclaimer covering forward-looking statements as described in the Sustainability Report.³¹

³¹ [2023 Sustainability Report](#), pg 89.